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October 3, 1991

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BY FEDERAL EXPRESS

Ms. Vicki Beard
Illinois Environmental Protection Agency
Division of Land Pollution
2200 Churchill
Springfield, Illinois 62706

Re: **Monsanto v. Aetna, et al.**
FOIA Request of Krummrich/Sauget Material
Our File No.: 15940-14

Dear Ms. Beard:

I am enclosing a copy of my original FOIA request regarding the above-referenced matter. I am not including the index of documents which was attached to the original request because, as we discussed, it will be much easier for us to review IEPA's files in Springfield than for you to compare the items listed on the index with the materials housed at your facility.

This request is made on behalf of several insurance companies named as defendants in the above-referenced action pending in the Superior Court of Delaware. In this case, Monsanto is seeking insurance coverage for defense and indemnity costs incurred in cleaning up several sites and groundwater contamination in the Sauget area. Monsanto has specifically identified the following areas in the Sauget region:

1. Krummrich Landfill (Site R)
2. Route 3 Drumsite;
3. Sauget Wastewater Treatment Plant (Site O)
4. Sauget Landfill (Site Q)

Ms. Vicki Beard
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5. Site G;
6. Site H;
7. Site I;
8. Site K;
9. Site L;
10. Site M;
11. Site P;
12. Dead Creek (Sector A);
13. Dead Creek (Sector B).

As we have discussed, we would like access to all documents and materials in IEPA's possession relating in any way to the above-listed sites, including but not limited to, the following:

1. any and all correspondence to and from the IEPA and any other person, corporation or entity related to these sites;
2. any groundwater, soil and air testing data/reports (including well sampling data), permit applications, permits and permit violation notices (including warning letters);
3. any and all site inspection reports;
4. any and all pleadings, discovery requests, discovery responses, hearing transcripts, deposition transcripts, interim and final settlement agreements, consent decrees, RI/FS reports and studies (with exhibits) conducted by and/or for the IEPA or any other entity relating to these sites;
5. any and all videotapes, photographs or maps; and
6. all responsive materials which may be in storage and/or on microfilm.

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If possible, please provide to us an estimate of the volume of responsive materials before October 22, 1991.

We appreciate your assistance in this matter and look forward to meeting with you on October 23. In the meantime, if you have any questions regarding this FOIA request, please do not hesitate to contact me.

Very truly yours,

HASKELL & PERRIN

A handwritten signature in cursive script that reads "Eileen King Bower".

By: Eileen King Bower

EKB.8/sfd
Enclosure
cc: Mara McGinnis
Paul Takof

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January 9, 1991

Ms. Vicki Beard
Division of Land Pollution
2200 Churchill
Springfield, Illinois 62706

Re: Monsanto v. Aetna, et al.
FOIA Request of Sauget/Krummrich Site
Our File No.: 15940-24

Dear Ms. Beard:

This letter confirms our telephone conversation of January 8, 1991 in which I informed you that I have an index of IEPA documents which I obtained from co-counsel in the above-referenced litigation concerning the Sauget/Krummrich environmental site. As I explained to you, I would like to know if the enclosed index constitutes a complete listing of materials currently housed in IEPA files. Note that the enclosed index lists documents from both the USEPA and the IEPA. I have highlighted all entries which appear to be from IEPA files.

Please compare the highlighted items on the index with the documents in your files. If there are additional documents in your files which are not included on the index, please contact me as soon as possible. If, however, the enclosed index constitutes a complete listing of all the information in IEPA files regarding the Sauget/Krummrich site, please send a letter confirming that fact.

I appreciate your assistance in this matter. If you have any questions regarding this request, please contact me.

Very truly yours,

HASKELL & PERRIN



By: Eileen King Bower

EKB.7/sfd
Enclosure